

**ADMINISTRATIVE ACTION DATA SHEET/
CASE CONCLUSION DATA SHEET
COMBINATION
BASE FORM
Region 4**



For TDMO Use Only:

ICIS Entry: _____

Date: _____

Case Name: Mortgage Lenders of America

Docket Number: CWA-04-2019-9970(b)

NOTE: FORM WILL BE RETURNED IF THIS SECTION IS INCOMPLETE

Name of Person Completing Form: Joel Strange

Printed Name of Program Office Supervisor of Designee: Dan O'Lone

- ☒ EJScreen Checklist(s) Has Been Completed and Is Attached
- ☒ Program-Specific Pages Are Attached
- ☒ Complying Actions Are Correctly Marked
- ☒ Pollutant Calculations and Costs Have Been Reviewed
- ☒ All Applicable Sections Of This Form Are Complete and Accurate

Signature of Program Office Supervisor or Designee: _____

DANIEL
O'LONE

Digitally signed by
DANIEL O'LONE
Date: 2020.09.17
11:05:51 -04'00'

Instructions and Information

The purpose of this form is to capture and report all Region 4 enforcement actions and the:

- Penalties assessed
- Pollutants reduced, treated or eliminated
- Pollutants prevented from being released
- SEPs
- Actions the respondent/defendant has taken or will take to achieve compliance as a result of this action.

This form is to be submitted when:

- (1) An administrative complaint is filed;
- (2) An administrative settlement or order is filed;
- (3) A non-penalty (compliance) order is issued;
- (4) A judicial consent decree or court order is entered.

Please be aware that the data on this form **will be released to the public through ECHO.**

Submit this Base Form **along with:**

- **The appropriate program-specific forms**
- **A copy of the signed/filed/entered enforcement document**

to R4ICIS@epa.gov using #(program), case name, and "CCDS" in the subject line.

All forms and guidance documents referenced in this form can be found at: <http://r4intra.epa.gov/orc/icis.html>

 **Questions? Please contact Teresa Shirley (2-9647) or Priscilla Johnson (2-9614).** 

FACILITY/SITE INFORMATION

How Many Facilities/Site Are Associated With This Action? 1

Are Any of These Facilities/Sites Located Outside Region 4? ☐ Yes ☒ No

COMPLETE FACILITY/SITE INFORMATION AND OBTAIN AN EJ CHECKLIST FOR EVERY FACILITY LOCATED WITHIN REGION 4.

LOCATION OF VIOLATION (REQUIRED)

Facility/Site Name Captains Cove Subdivision

Street Address _____
(DO NOT USE A P.O BOX NUMBER) (Use Location of Violation)

City St. Simons State GA Zip (REQUIRED) 31522

EPA FRS or ICIS No. _____

Is This Indian Land? ☐ Yes ☒ No If Yes, What Tribe? _____

Latitude: 31.214984 Longitude: -81.372104
(In Decimal Format) (In Decimal Format)

Please select one: ☐ Federal Facility ☒ No Federal Facility Involvement
☐ Non-Federal Party Impacting Federal Property. Explain: _____

Please Complete EJScreen Checklist (Pages 3-5)

For TSCA Lead and CWA Oil Spill Only

Is the Corporate Address/Home Office the Same as the Address Above?

☐ No (Complete the corporate office info below) ☐ Yes (Skip to and proceed with EJScreen)

If No, Please Provide Corporate/Home Office Address:

Company Name _____

Street Address _____

City _____ State _____ Zip (REQUIRED) _____

EPA FRS or ICIS No. _____

Latitude: _____ Longitude: _____

Did a violation occur at this location? ☐ Yes (Complete EJ Screen for this location)
☐ No (EJScreen is not required for this location)

Environmental Justice Checklist

EXEMPTION 5

EXEMPTION 5

EXEMPTION 5

Lead EPA Attorney _____ Stephen Smith _____ Phone No. 29554 _____

EPA Program Contact _____ Joel Strange _____ Phone No. 29455 _____

List Statute(s) and Section(s) Violated (e.g., CAA, EPCRA, CERCLA, etc., (**NOT** U.S.C. nor CFR):

____ CWA ____ / ____ 404 ____ ____ / ____ ____ / ____

____ / ____ ____ / ____ ____ / ____

CFR Violation Citation(s):

40 CFR Part _____ Section _____ 40 CFR Part _____ Section _____

40 CFR Part _____ Section _____ 40 CFR Part _____ Section _____

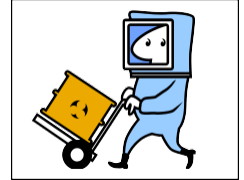
FOR RCRA CASES ONLY:

☐ SQG ☐ LQG ☐ CESQG

Is this order being used to implement RCRA Corrective Action activities at the facility (e.g., RCRA facility investigation, groundwater remediation, etc.)? ☐ Yes ☐ No

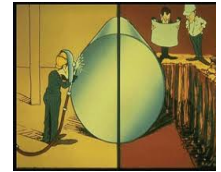
For 3013 Actions, Please Select:

☐ Corrective Action ☐ Subtitle C – TSD Facility
☐ Subtitle C – Generator ☐ Subtitle C -- Transporter



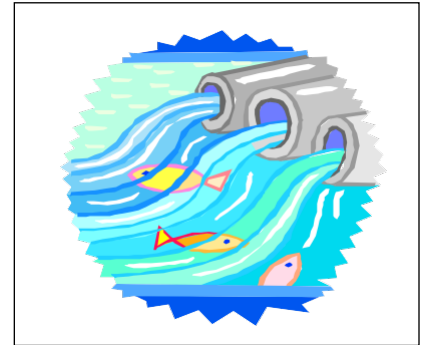
FOR UST CASES ONLY:

Select One: ☐ Regulatory ☐ Corrective Action
AND
Select One: ☐ Petroleum ☐ Hazardous Substances



FOR NPDES CASES ONLY (Check all that apply):

- ☐ CWA Sec 301, Discharge Without a Permit, Other Unpermitted Discharges
- ☐ CWA Sec 405, Sewage Sludge Disposal
- ☐ CWA Sec 504, Emergency Powers
- ☐ CWA Sec 301/307, Effluent Limitations (Pretreatment)
- ☐ CWA Sec 301/402, CSO
- ☐ CWA Sec 301/402, CAFOs
- ☐ CWA Sec 301/402, Other Permit Violations-Limits, Reporting, Schedule
- ☐ CWA Sec 301/402, Pesticide Applier
- ☐ CWA Sec 301/402, SSO
- ☐ CWA Sec 301/402, Stormwater – Construction
- ☐ CWA Sec 301/402, Stormwater – Non-Construction
- ☐ CWA Sec 301/402, MS4
- ☐ CWA Sec 308, Information Request, Records



FOR LEAD PAINT CASES ONLY (Check All That Apply):

Lead Abatement (TSCA Section 402(a)):

- ☐ Lead-Based Paint Requirements – Active Site (Where Work is Done)
- ☐ Lead-Based Paint Requirements – Corporate Office (Books/Records)
- ☐ Lead-Based Paint Requirements – Trained/Certified
- ☐ Lead-Based Paint Requirements – Training Provider

Lead RRP (TSCA Section 402(c)):

- ☐ Active Site (Where Work is Done)
- ☐ Corporate Office (Books/Records)
- ☐ Trained/Certified
- ☐ Training Provider

- ☐ Pre-Renovation Education Rule (TSCA Section 406(b))
- ☐ Violation of Section 1018 – Disclosure Rule (TSCA Section 409)



FOR CAA 112(r) – RISK MGMT PLAN AND GENERAL DUTY CLAUSE ONLY:

- ☐ Risk Management Plan (For ICIS Data Use - 112(r)(7))
- ☐ General Duty Clause (For ICIS Data Use - 112(r))

FOR TSCA SECTION 8 CASES ONLY:

- ☐ Section 8 – Reporting and Retention of Information – Existing Chemicals
- ☐ Section 8A – Failure to Comply with Preliminary Assessment Information Reporting and & Chemical Specific Recordkeeping Rules – Existing Chemicals – **Assessment**
- ☐ Section 8A - Failure to Comply with Preliminary Assessment Information Reporting and & Chemical Specific Recordkeeping Rules – Existing Chemicals – **Recordkeeping**
- ☐ Section 8B – Failure to Comply with Invention Update Rule – Existing Chemicals
- ☐ Section 8C - Failure to Comply with Allegations of Significant Adverse Reactions Record and Reporting Rule – Existing Chemicals
- ☐ Section 8D – Failure to Comply with Health and Safety – Existing Chemicals
- ☐ Section 8E – Failure to Comply with Substance Risk – Existing Chemicals

Is This A Multi-Media Action?

☒ **No - If No, Skip**  **This Section**

☐ **Yes - If Yes, Check All That Apply**

CAA:

- ☐ Mobile Source (Title II)
- ☐ Stationary Source (Other Than Title II)
- ☐ Prevention of Accidental Releases (112(r))

CERCLA:

- ☐ Hazardous Site Response (CERCLA Superfund Other Than 103 and/or RCRA 3013 or 7003)

CWA:

- ☐ NPDES (Other Than 311 and 404)
- ☐ Oil Pollution (311)
- ☐ Wetlands (404)

EPCRA or EPCRA/CERCLA:

- ☐ Community Right-to-Know (313)
- ☐ Release Notification/Emergency Preparedness PCBs)
- (Non-313 and/or CERCLA 103)

FIFRA:

- ☐ Pesticides

MPRSA:

- ☐ Ocean Dumping

RCRA:

- ☐ Hazardous Waste Mgmt (Subtitle C)
- ☐ Solid Waste Mgmt (Subtitle D)

SDWA:

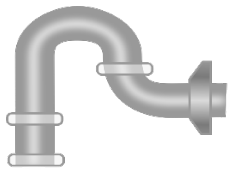
- ☐ Public Water Supply (1414 et seq.)
- ☐ UIC (1421 et seq.)

TSCA:

- ☐ Asbestos Hazardous Emergency Response Act (201)
- ☐ Lead Exposure Reduction (409)
- ☐ PCBs (6(e))
- ☐ Toxic Substance (Other Than Lead or

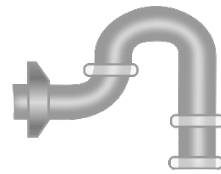
UST:

- ☐ Underground Storage Tanks (Subtitle I)



Pipeline Information

(Tracking Cases from Initiation to Conclusion)



This Data Will Be Used to Link All Matters (Inspections, Information Requests, Enforcement Actions)
Related to This Case

The Pipeline is Considered Closed When the Last Enforcement Action is Issued

Has An Inspection Been Conducted? ☐ Yes ☒ No ☐ N/A

Dates of Inspection(s)? _____

Has EPA Taken Any Previous Formal Enforcement Actions Regarding These Violations
(Do NOT Include NOVs)? ☐ Yes ☒ No ☐ N/A

If Yes, Please List Docket Numbers of Previous Actions

Has EPA Issued Any Information Requests for These Violations?

☒ No

☐ Yes - Dates _____

Is This an Amended Enforcement Action? ☐ Yes ☒ No

Do you Anticipate Another Enforcement Action Being Issued for These Violations?

☐ Yes (*ICIS Pipeline Will Remain Open*)

☒ No (*ICIS Pipeline Will Be Closed*)

☐ Not Sure At This Time (*ICIS Pipeline Will Remain Open. Notification Should Be Submitted to
R4ICIS@epa.gov If/When a Decision is Made to Close the Pipeline With No Further Action.*)

FY 2020 National Compliance Initiatives (Check All That Apply)

CAA Mobile Source:

- ☐ Aftermarket Defeat Devices – Non-Road
- ☐ Aftermarket Defeat Devices – On-Road

NPDES SNC:

- ☐ Municipal POTW
- ☐ Non-Sewerage, Non-Industrial
- ☐ Private Sewerage Facilities
- ☐ Industrial

CCAC:

- ☐ HAP Areas of Concern
- ☐ Ozone Nonattainment
- ☐ VOC Other

Drinking Water:

- ☐ Community Water Systems

Chemical Accident Risk Reduction (CAA RMP; CAA GDC; EPCRA 304; CERCLA 103)*

- | | |
|---|--|
| <ul style="list-style-type: none"> <input type="checkbox"/> Chemical Manufacturing* <input type="checkbox"/> Gas Processing* <input type="checkbox"/> Ammonia Refrigeration* | <ul style="list-style-type: none"> <input type="checkbox"/> Fertilizer Distributing* <input type="checkbox"/> Refineries* <input type="checkbox"/> Other High Risk* |
|---|--|

RCRA/Air:

- | | | |
|--|--|--|
| <ul style="list-style-type: none"> <input type="checkbox"/> OPT Sub-universe* <input type="checkbox"/> RCRA Air Violations* <input type="checkbox"/> Non-RCRA Air Violations* | <ul style="list-style-type: none"> <input type="checkbox"/> Other Facilities* <input type="checkbox"/> RCRA Air Violations* <input type="checkbox"/> Non-RCRA Air Violations* | <ul style="list-style-type: none"> <input type="checkbox"/> Universe* <input type="checkbox"/> RCRA Air Violations* <input type="checkbox"/> Non-RCRA Air Violations* |
|--|--|--|

For ICIS Use Only: *Indicates Case File Required

FY 2020 Regional Compliance Initiatives

- ☐ RCRA Financial Assurance



IF THIS ACTION IS A COMPLAINT WITHOUT A SETTLEMENT, STOP HERE
DO NOT RELEASE – Internal Agency Document

CASE CONCLUSION INFORMATION

FOR ADDITIONAL GUIDANCE, SEE: <http://r4intra.epa.gov/orc/icis.html>

Was Alternative Dispute Resolution (ADR) Used in This Case?

EXEMPTION 5



Was An Environmental Management System Requested?

☐ Yes

☒ No

Judicial Cases ONLY

Consent Decrees and Court Orders Also Require a **CD Milestone Form**

Complaint Filed Date: _____

Settlement Lodged Date: _____

Settlement Entered Date: _____

Requires Completion of CD Milestone Form

Penalty Information



(Do NOT Include INTEREST!)

☐ No Penalty

(Note: For multi-regional cases, report ONLY the penalty amounts associated with facilities in Region 4)

Total Assessed **FEDERAL** Penalty \$ 20,000

(If Shared) EPA Share \$

(If Shared) Federal Agency/Dept. Other than EPA \$

Name of Agency? _____

(If Shared) State or Local Share \$

For Multi-Media Actions, List **FEDERAL** Amounts by Statute. (If this is ALSO a multi-regional case, report **ONLY** the penalty amounts associated with facilities in Region 4.)

Statute	Amount
_____	\$ _____
_____	\$ _____
_____	\$ _____

Cost Recovery Information (Superfund/RCRA/Oil Spill)



Amount of Cost Recovery Awarded:

\$ _____ EPA Share

\$ _____ State and/or Local Government Share

\$ _____ Other

For a total of: \$ _____

Is This a Cash-Out Settlement? ☐ Yes ☐ No (Please See Interim Guidance, Dated 9/29/09)

If Yes, Value of the PRP-Funded Response Actions \$ _____



FOR SUPERFUND ACTIONS WITH COST RECOVERY **ONLY**,

HERE



SUPPLEMENTAL ENVIRONMENTAL PROJECT INFORMATION

(If More Than One SEP, Complete This Page for EACH SEP)

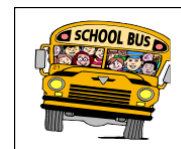
If No SEP, Skip  This Page

1. Is Environmental Justice Addressed by Impact of SEP? ☐ Yes ☐ No
2. SEP Description _____

3. **Category of SEP(s) (Check ONLY one):**

Cost of SEP: \$ _____

- ☐ Public Health
- ☐ Pollution Prevention **(Complete Question #4 Below)**
 - ☐ Equipment/Technology Modifications
 - ☐ Process/Procedure Modifications
 - ☐ Production Reformulation/Redesign
 - ☐ Raw Materials Substitution
 - ☐ Improved Housekeeping/O&M/Training/Inventory Control
 - ☐ In-Process Recycling
 - ☐ Energy Efficiency/Conservation
- ☐ Pollution Reduction **(Complete Question #4 Below)**
- ☐ Environmental Restoration and Protection
- ☐ Assessments and Audits
- ☐ Environmental Compliance Promotion
- ☐ Emergency Planning and Preparedness
- ☐ Other Program-Specific SEP



4. **Pollution Reduction/Prevention Estimates Achieved by SEP:**

Annual Amount

CHECK ONE:

- ☐ Reduced
- ☐ Eliminated
- ☐ Treated

Pollutant

Units* (See List Below)

Potentially
Impacted Media**
(See List Below)

_____	_____	_____	_____
_____	_____	_____	_____

***Acceptable Units**

Acres (Wetlands)
Building Units (Lead-Based Paint)
Cubic Yards (CERCLA & RCRA Corrective Action)
Gallons
Gallons Spilled
Single-Family Housing Units
Multi-Family Housing Units
Pounds
Pounds Per Year
Linear Feet of Small Stream (<10 ft. Wide)
Linear Feet of Med. Stream (10-20 ft. Wide)
Linear Feet of Large Stream (>20 ft. Wide)
People (SDWA/FIFRA)
Number of Wells (UIC)

****Acceptable Potentially Impacted Medias**

Air
Housing
Humans/People
Schools
Land
Building Units/Schools
Soil
Water – Navigable/Surface
Water -- Drinking
Water -- Ground
Water – Underground Source of Drinking Water
Water – Stormwater
Water – Wastewater to POTW Number of Schools
Water – Wetlands

DO NOT RELEASE – Internal Agency Document

**Violations – Complete This Section (Pages 14-17)
Then,**

**Attach APPROPRIATE CCDS PROGRAM-SPECIFIC PAGES at the end of the
form. GO TO**

<http://r4intra.epa.gov/orc/icis.html>

CAA

- | | |
|---|---|
| <input type="checkbox"/> Asbestos Demolition/Renovation Work Practice Req. | <input type="checkbox"/> Air Emissions Not Otherwise Specified |
| <input type="checkbox"/> Asbestos – Failure to Maintain Records | <input type="checkbox"/> Tampering w/Emissions Control Device |
| <input type="checkbox"/> Asbestos – Failure to Report; Notify; or Inform | <input type="checkbox"/> Violation of Reporting Requirements |
| <input type="checkbox"/> Asbestos – Inspect | <input type="checkbox"/> Violation of Requirement to Monitor/Maintain Records |
| <input type="checkbox"/> Asbestos Requirement Violation | <input type="checkbox"/> Other/Miscellaneous |
| <input type="checkbox"/> Asbestos – Sample | <input type="checkbox"/> New Source Review |
| <input type="checkbox"/> Acid Rain | <input type="checkbox"/> Opacity |
| <input type="checkbox"/> Discharge, Emission or Activity w/out Required Permit | <input type="checkbox"/> Stratospheric Ozone Protection Plan |
| <input type="checkbox"/> Violation of Permit Requirement | <input type="checkbox"/> Risk Management Plan |
| <input type="checkbox"/> National Emission Standard for Hazardous Air Pollutant | <input type="checkbox"/> Prevention of Significant Deterioration |
| <input type="checkbox"/> New Source Performance Standard | |

NPDES

- | | |
|---|--|
| <input type="checkbox"/> Animal Feedlots | <input type="checkbox"/> Violation of Reporting Requirements |
| <input type="checkbox"/> Discharge, Emission, or Activity w/out Required Permit | <input type="checkbox"/> Violation of Sludge Disposal Requirements |
| <input type="checkbox"/> Sanitary Sewer Overflows | <input type="checkbox"/> Violation of Requirements of Monitor/Maintain Records |
| <input type="checkbox"/> Stormwater Overflows | <input type="checkbox"/> Pretreatment Violation |
| <input type="checkbox"/> Violation of a Permit Requirement | |

WETLANDS

- | | |
|---|--|
| <input checked="" type="checkbox"/> Discharge Without or In Violation of a 404 Permit | <input type="checkbox"/> Other/Miscellaneous |
| <input type="checkbox"/> Violation of a Previously Issued AO | |

OPA

- | | |
|--|--------------------------------|
| <input type="checkbox"/> Failure to Have an Adequate SPCC Plan | <input type="checkbox"/> Spill |
| <input type="checkbox"/> Other | |

UST

- | | |
|---|---|
| <input type="checkbox"/> Leak Detection and Repair | <input type="checkbox"/> Violation of Reporting Requirements |
| <input type="checkbox"/> Requirements Other Than LDAR | <input type="checkbox"/> Violation of Requirement to Monitor/Maintain Records |

DO NOT RELEASE – Internal Agency Document

RCRA

- | | |
|---|---|
| <input type="checkbox"/> Battery Management Act Violation | <input type="checkbox"/> Labeling or Marking Requirements |
| <input type="checkbox"/> Benzene Waste | <input type="checkbox"/> Land Ban |
| <input type="checkbox"/> Bevill Enforcement Case | <input type="checkbox"/> Monitoring Requirements |
| <input type="checkbox"/> Closure & Post Closure Requirement | <input type="checkbox"/> K061 Initiative |
| <input type="checkbox"/> Container Requirements | <input type="checkbox"/> Misidentified Waste |
| <input type="checkbox"/> Discharge, Emission, or Activity w/out Required Permit | <input type="checkbox"/> Permit Evader |
| <input type="checkbox"/> Disposal Facility Requirements – Not Otherwise Specified | <input type="checkbox"/> Treatment Facility Requirement |
| <input type="checkbox"/> Exports Violation | <input type="checkbox"/> Violation of a Previously Issued AO |
| <input type="checkbox"/> Imports Violation | <input type="checkbox"/> Violation of a Permit Requirement |
| <input type="checkbox"/> Failure to Notify | <input type="checkbox"/> Violation of a Requirement of Monitor/Maintain Records |
| <input type="checkbox"/> Failure to Report Information as Required | <input type="checkbox"/> Groundwater Monitoring Requirements |
| <input type="checkbox"/> General Facility Requirements | |

UST

- | | |
|---|---|
| <input type="checkbox"/> Leak Detection and Repair | <input type="checkbox"/> Violation of Reporting Requirements |
| <input type="checkbox"/> Requirements Other Than LDAR | <input type="checkbox"/> Violation of Requirement to Monitor/Maintain Records |

EPCRA & EPCRA/CERCLA

- | | |
|---|---|
| <input type="checkbox"/> CERCLA Reportable Quantity Discharge Violation | <input type="checkbox"/> Violation of Requirement to Monitor/Maintain Records |
| <input type="checkbox"/> Toxics Release Inventory (Section 313) | <input type="checkbox"/> Violation of Reporting Requirements |

UIC

- | | |
|---|---|
| <input type="checkbox"/> Casing and Cementing | <input type="checkbox"/> Unauthorized Operation of Class IV Well |
| <input type="checkbox"/> Injection Between Outermost Casing | <input type="checkbox"/> Monitoring Requirements |
| <input type="checkbox"/> Injection Beyond Authorized Pressure | <input type="checkbox"/> Unauthorized Brine Discharge |
| <input type="checkbox"/> Mechanical Integrity | <input type="checkbox"/> Violation of Reporting Requirements |
| <input type="checkbox"/> No Approved Plugging & Abandonment Plan | <input type="checkbox"/> Violation of Requirement of Monitor/Maintain Records |
| <input type="checkbox"/> Non-Compliance w/Plugging & Abandonment Plan | <input type="checkbox"/> Other/Miscellaneous |
| <input type="checkbox"/> Unauthorized Injection | |

PWS

- | | |
|--|--|
| <input type="checkbox"/> Failure to Submit DMRs | <input type="checkbox"/> Total Coliform Rule |
| <input type="checkbox"/> Maximum Contaminant Level | <input type="checkbox"/> Surface Water Treatment Rule |
| <input type="checkbox"/> Monitoring/Reporting | <input type="checkbox"/> Violation of Permit Requirement |
| <input type="checkbox"/> Notification to Public | <input type="checkbox"/> Recordkeeping Violations |
| <input type="checkbox"/> Sampling and Analyzing | <input type="checkbox"/> Other/Miscellaneous |

DO NOT RELEASE – Internal Agency Document

TSCA

AHERA:

- ☐ LEA – Clearance
- ☐ LEA – Failure to Implement Mgmt Plan
- ☐ LEA – Failure to Notify
- ☐ Fiber Release
- ☐ Improper Sampling
- ☐ Inspection
- ☐ Management Plan
- ☐ Operations and Maintenance
- ☐ LEA – Response Action
- ☐ LEA – Responsibility
- ☐ LEA – Unaccredited Lab
- ☐ Others – Clearance
- ☐ Others – Inspection
- ☐ Others – Inspection Accreditation
- ☐ Others – Lab
- ☐ Others – Management Plan
- ☐ Others – Response Act. Accreditation
- ☐ Others – Unaccredited Lab
- ☐ Others – Unaccredited Pers. Dev. Mgmt Plan
- ☐ Others – Unaccredited Resp. Act. Workers
- ☐ Others – Unaccredited Work/Accredited Super.
- ☐ Accreditation
- ☐ Certifications and Training Accreditations
- ☐ Course Violations Including Hours – Curriculum
- ☐ Section 5
- ☐ Section 5 (e) / (f)
- ☐ Section 5 General PMN
- ☐ Section 5 TME
- ☐ Section 7 Report Late
- ☐ Section 8(a) Level A
- ☐ Section 8(b) Inventory Update
- ☐ Section 8(c) Recordkeeping
- ☐ Section 8(d) Reporting
- ☐ Section 8(e) Reporting
- ☐ Section 8 Reporting and Recordkeeping
- ☐ Improper Disposal of PCBs/Items
- ☐ Exports Violation
- ☐ Failure to Disclose Information
- ☐ Failure to Include Info In Contract/Lease
- ☐ Failure to Inform of Obligations
- ☐ Failure to Notify
- ☐ Failure to Notify EPA of PCB Waste Activities
- ☐ Failure to Provide Available Information
- ☐ Failure to Report Information as Required
- ☐ Failure to Retain Disclosure Records
- ☐ Falsify Applications, Reports, Information
- ☐ Imports Violation
- ☐ Labeling/Marking Violation
- ☐ Lead-Based Paint
- ☐ Manifesting; No Manifests or Manifest Errors
- ☐ Recordkeeping Violations
- ☐ Refusal to Allow Inspection or Sampling
- ☐ Refusal to Submit Reports (Sections 5-8, 11, 9)
- ☐ Training Course Provider Violation
- ☐ Violation of a Permit Requirement
- ☐ Violation of PCB Rules
- ☐ Violation of Req. to Monitor/Maintain Records
- ☐ Violation of Storage Facility Requirements
- ☐ Violation of Reporting Requirements
- ☐ Worker Protection Standards
- ☐ Work Practice Standards

DO NOT RELEASE – Internal Agency Document

FIFRA

- ☐ Advertised Pesticide for Unregistered Use
- ☐ Advertised Pesticide Not Registered
- ☐ Container Requirements
- ☐ Exports Violation
- ☐ Imports Violation
- ☐ Failure to Notify
- ☐ Failure to Report Information as Required
- ☐ General Facility Requirements
- ☐ Good Laboratory Practices
- ☐ Packaging Requirements
- ☐ Misuse of a Registered Pesticide
- ☐ Misuse Pesticide Under Experimental Permit
- ☐ No Records for Restricted Use Pesticide
- ☐ Pesticide Not Registered
- ☐ Establishment Not Registered (Section 7)
- ☐ Section 3(a) Violation – Unregistered Pesticide
- ☐ Add to/Take From a Pesticide to Defeat Act
- ☐ Pesticide Safety Trainer
- ☐ Posting Pesticide
- ☐ Posting Pesticide Safety Information
- ☐ Test Pesticide on Humans in Violation of Act
- ☐ Composition Differs
- ☐ Adulterated
- ☐ Violations of Reporting Requirements
- ☐ Violations of Requirement to Monitor/Maintain Records

- ☐ Worker Protection Standards
- ☐ Other/Miscellaneous

MISBRANDED:

- ☐ Directions for Use Not Adequate
- ☐ Failed to Bear Spanish Signal Word
- ☐ Failed to Bear WPS Reference Statement
- ☐ False Claim on Label
- ☐ Imitation of Another Pesticide
- ☐ Inadequate Precautionary Labeling
- ☐ Ingredient Statement Not on Container
- ☐ Label Does Not Bear Registration Number
- ☐ Label lacks Poison Information
- ☐ Labeling Does Not Bear Use
- ☐ Labeling Incomplete
- ☐ Lack of Prominence
- ☐ Not Registered for Use in USA
- ☐ Package Does Not Conform
- ☐ WPS Reference Statement Contains Errors
- ☐ WPS Reference Statement Is Incomplete

DO NOT RELEASE – Internal Agency Document

ATTACH APPROPRIATE PROGRAM-SPECIFIC PAGES HERE